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P.O. BOX 588
SCIENCE ROAD
NORWALK, CT 06852
(203) 866-5551
(800) 431-7900
FAX: (203) 866-1268

SPECIALTY
CHEMICALS
201-16459A

October 27, 2006

Dr. Ralph Northrop
High Production Volume Chemical Branch

Dear Dr. Northrop:

We are responding to EPA's request for clarification of the chemical structures of the sponsored substances in our HPV submission for Dinonylnaphthalene and its derivatives.

1. "Isononyl" vs. "nonyl"

King Industries, Inc. has been manufacturing these chemicals for more than 50 years and long before the TSCA regulations came about in 1976. Early 1960's literature studies refer to calcium and barium dinonylnaphthalene sulfonates [REDACTED]

ChemAbstract Service registry numbers (CAS#'s) for the barium and calcium dinonylnaphthalene sulfonates and the dinonylnaphthalene sulfonic acid were previously assigned to these chemicals by ChemAbstract Services prior to 1977 without regard to the manufacturing process or the composition of the raw materials used in this process. When the Toxic Substances Control Act was promulgated in 1977, King Industries registered these compounds [REDACTED]

As a result of the TSCA registration process CAS service assigned the diisononyl nomenclature and CAS#'s to those chemicals that King Industries was adding to the Inventory for which there was no pre-existing CAS#'s. [REDACTED]

[REDACTED]

For a Premanufacture notice in 1986, EPA requested that King Industries refer to the new chemical substance as [REDACTED]. We complied with EPA's request. In late 1999, EPA requested that a new chemical substance King was registering be referred to as [REDACTED]. In 2005, EPA requested that King use the description [REDACTED]. All of these products were [REDACTED] produced from the same raw materials using the same manufacturing process since the products were first introduced in the early 1950's, yet each was assigned a different chemical description by CAS.

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2. Nonene

King Industries has been manufacturing these products for over 50 years using the same raw materials of naphthalene and nonene. Nonene is the generic name that has been used to designate the material we purchased from our suppliers for over 50 years. [REDACTED]

[REDACTED]

[REDACTED]

3. Isomer distribution

[REDACTED]

[REDACTED]

We hope that this information addresses EPA's questions concerning our products.

Please do not hesitate to contact me if you require further clarification. We look forward to hearing your comments.

Sincerely,

Leonard J. Calbo
Vice President, Coatings Products Group

cc: Charles M. Auer

Encl.

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References

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